

Yerington Site-Wide Milestones and Target Dates, by OU

OU:	Key Milestones, Interim Milestones and Select Key Deliverables:	Who:	Target Date:	Definite, Conditional, or Complete	Completion /Submittal Date:
OU-1: HHRA/ RI	Provide input on recent Geochemical Data Summary Report (DSR) to AR	EPA	2/28/15	Complete	3/3/15
	Review and discuss Flow Model Supplement and determine next steps	AR	3/23/15	Complete	4/8/15
	Meeting to discuss Flow Model and Geochemical DSR	All	4/8/15	Complete	4/8/15
	+ Scope and discuss Contaminant Transport Model (link to Flow Model)	All	5/7/15	Complete	5/7/15
	Agreement and decision on three remaining pieces of GW RI WP: 1. Updated BGQA; 2. Bedrock Groundwater Assessment TM; 3. Geochemical Characterization DSR.	All	5/7/15	Complete	5/7/15
	+ Scope and discuss Bedrock Characterization WP	All	5/7/15	Complete	5/7/15
	Submit Additional Monitor Well DSR	AR	6/15/15	Complete	6/11/15
	Submit response to AR email proposing BHHRA approach for OU-1 and OU-3	EPA	7/1/15	Complete	6/30/15
	Submit RI DSR #1 –Background Water Quality Assessment (BGQA)	AR	7/1/15	Complete	7/6/15
	*Review and provide comments, noting threshold issues, on RI DSR #1	EPA, NV	8/1/15	Definite	
	Submit HHRA Tech Memo (TM) #1 –Revised Conceptual Site Model	AR	8/1/15	Definite	
	*Review and provide comments, noting threshold issues, on HHRA TM #1	EPA, NV	9/1/15	Definite	
	Initiate bedrock drilling program	AR	9/1/15	Definite	
	Submit RI DSR #2 –Geochemical Characterization Report	AR	9/1/15	Definite	
	*Review and provide comments, noting threshold issues, on RI DSR #2	EPA, NV	10/1/15	Definite	
	Submit HHRA TM #2 –Data Evaluation	AR	10/1/15	Definite	
	*Review and provide comments, noting threshold issues, on HHRA TM #2	EPA, NV	11/1/15	Definite	
	Submit HHRA TM #3 –Exposure Assessment	AR	12/1/15	Definite	
	Submit Bedrock Characterization DSR (in lieu of WP)	AR	12/31/15	Definite	
	*Review and provide comments, noting threshold issues, on HHRA TM #3	EPA, NV	1/1/16	Definite	
	Submit HHRA Work Plan (WP)	AR	2/1/16	Conditional	
	Review and provide comments on HHRA WP	EPA, NV	4/1/16	Conditional	
	Complete bedrock drilling and data collection	AR	4/1/16	Conditional	
	Submit Draft HHRA/RI Report to EPA & NDEP	AR	6/1/16	Conditional	
	Submit RI TM #4 –Bedrock Groundwater Assessment	AR	6/1/16	Conditional	
	*Review and provide comments, noting threshold issues, on RI Bedrock GWA TM	EPA, NV	7/1/16	Conditional	
	Review and provide comments on Draft HHRA/RI Report	All	8/1/16	Conditional	
	Submit Final HHRA/RI Report to EPA & NDEP (Could be pushed back depending on	AR	9/1/16	Conditional	

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	bedrock field work and monitoring requirements)				
OU-1: FS	Initiate Conceptual Feasibility Study (FS) discussions, focusing especially on RAOs	EPA, NV	5/1/15	Complete	5/1/15
	**Initiate development of Draft FS	AR	8/5/15	Conditional	
	Submit Draft FS Report	AR	9/1/16	Conditional	
	Review and provide comments on Draft FS Report	All	11/1/16	Conditional	
	Submit Draft Final FS	AR	1/1/17	Conditional	
	Review and provide comments on Draft Final FS Report	All	3/1/17	Conditional	
OU-3: HHRA/ RI	Review HHRA scoping meeting notes & provide input/guidance to AR (was this done?)	EPA	2/25/15	Definite	
	Send letter to AR confirming approval of Step-Out Soils Characterization DSR and directions to proceed with Draft RI Report preparation	EPA	3/1/15	Complete	3/18/15
	Outline State process for TPH (and possibly other COCs) to EPA and AR (to be rescheduled soon)	NV	3/27/15	Definite	
	Determine potential for phasing remedial action and provide guidance to AR on process for closure of TPH (and possibly all other COCs) soils under state guidance and regulations while following CERCLA process.	NV, EPA	5/1/15	Complete	5/1/15
	Provide agency thoughts on concept of passing OU-3 over to NDEP for State lead.	EPA	6/1/15	Definite	
	Submit response to AR email proposing BHHRA approach for OU-1 and OU-3	EPA	7/1/15	Complete	6/30/15
	+ Submit HHRA Tech Memo (TM) #1 – Revised Conceptual Site Model	AR	7/1/15	Conditional	
	Review and approve HHRA TM #1	EPA, NV	8/1/15	Conditional	
	Submit HHRA TM #2 – Data Evaluation	AR	9/1/15	Conditional	
	Review and approve HHRA TM #2	EPA, NV	10/1/15	Conditional	
	Submit HHRA TM #3 – Exposure Assessment	AR	11/1/15	Conditional	
	Review and approve HHRA TM #3	EPA, NV	12/1/15	Conditional	
	Submit HHRA WP	AR	1/1/16	Conditional	
	Review and provide comments on HHRA WP	EPA, NV	3/1/16	Conditional	
	Submit Draft RI Report to EPA & NDEP	AR	10/1/15	Conditional	
	Review and provide comments on Draft RI Report	All	12/1/15	Conditional	
	Submit Final HHRA/RI Report to EPA & NDEP	AR	1/1/16	Conditional	
OU-3: FS	Initiate Conceptual Feasibility Study (FS) discussions	EPA, NV	7/1/15	Definite	
	Initiate development of Draft FS	AR	1/1/16	Conditional	
	Submit Draft FS Report	AR	7/1/16	Conditional	
	Review and provide comments on Draft FS Report	EPA	9/1/16	Conditional	
	Submit Final FS Report	AR	10/1/16	Conditional	
	Review and provide comments on Final FS Report	EPA, NV	12/1/16	Conditional	
	Schedule drilling program and notify EPA & NDEP	AR	3/1/15	Complete	3/19/15
	Inform Atlantic Richfield of the specific analyses needed (was this was done?)	EPA	3/1/15	Definite	

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OU-4a: RI Drilling & DSRs	Initiate RI drilling program	AR	4/13/15	Complete	4/13/15
	Complete RI Phase 1a drilling program	AR	6/1/15	Complete	6/5/15
	Technical Working Group meeting/discussion on results of Phase 1a and potential changes to 1b drilling program	All	8/1/15	Definite	
	Complete RI Phase 1b drilling program and lysimeter installation	AR	9/1/15	Definite	
	Submit Phase 1 DSR	AR	1/1/16	Definite	
	Review and provide comments, noting key issues, on Phase 1 drilling program DSR	EPA, NV	2/1/16	Conditional	
	+ Submit Phase II/III (if needed) field sampling plan (FSP)	AR	3/1/16	Conditional	
	Review and provide comments on Phase II/III FSP	EPA, NV	4/1/16	Conditional	
	***Complete Phase II/III drilling program and submit DSR	AR	7/1/16	Conditional	
	Review and provide comments on Phase II/III DSR	EPA, NV	8/1/16	Conditional	
OU-4a: HHRA/ RI	The target dates for the following action items are conditional on whether AR needs to monitor lysimeters for three years to understand precipitation event effects on the material in the evaporation ponds, if we can simulate these events and gain the information sooner, or if moisture content is necessary to design a remedy for this area of the site. (The provided target dates could adjust by three years)			Conditional	
	***Submit HHRA TM #1 –Revised Conceptual Site Model	AR	10/1/15	Conditional	
	*Review and provide comments, noting threshold issues, on HHRA TM #1	EPA, NV	11/1/15	Conditional	
	***Submit HHRA TM #2 –Data Evaluation	AR	12/1/15	Conditional	
	*Review and provide comments, noting threshold issues, on HHRA TM #2	EPA, NV	1/1/16	Conditional	
	***Submit HHRA TM #3 –Exposure Assessment (conditional dependent on Phase II/III results & timing)	AR	1/1/16	Conditional	
	*Review and provide comments, noting threshold issues, on HHRA TM #3	EPA, NV	2/1/16	Conditional	
	***Submit HHRA WP	AR	3/1/16	Conditional	
	Review and provide comments on HHRA WP	All	5/1/16	Conditional	
	Submit Draft HHRA/RI Report to EPA & NDEP	AR	7/1/16	Conditional	
	Review and provide comments on Draft HHRA/RI Report	All	8/1/16	Conditional	
	Submit Final HHRA/RI Report (conditional based on need for Phases II/III work)	AR	9/1/16	Conditional	
OU-4a: FS	Initiate Conceptual Feasibility Study (FS) discussions, focusing especially on RAOs	EPA, NV	5/1/15	Definite	
	**Initiate development of Draft FS	AR	9/1/15	Conditional	
	Submit Draft FS Report (conditional based on need for Phases II/III work)	AR	3/1/16	Conditional	
	Review and provide comments on Draft FS Report	All	5/1/16	Conditional	
	Submit Draft Final FS	AR	7/1/16	Conditional	
	Review and provide comments on Draft Final FS Report	All	9/1/16	Conditional	
OU-7: HHRA/	Draft Data Quality Objectives discussion and identify path forward and next steps	EPA	3/26/15	Complete	3/26/15
	Set schedule and framework for Conceptual Site Model (CSM) & sampling WP	All	3/26/15	Complete	3/26/15
	Discuss phased approach for development of CSM	All	3/26/15	Complete	3/26/15

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RI	Submit CSM and DQOs to TWG and discuss	AR	6/30/15	Definite	
	Submit sampling strategy to TWG and discuss	AR	7/15/15	Definite	
	Submit HHRA Tech Memo (TM) #1 – Revised CSM (AR check in with risk assessor)	AR	8/1/15	Conditional	
	Submit Phase 1a FSAP	AR	9/1/15	Conditional	
	Review and approve HHRA TM #1 (informal, expedited review –use calls to approve) EPA, NV	9/1/15		Definite	
	Submit RI DSR #1 –Background, existing data	AR	9/1/15	Definite	
	Review and discuss RI DSR #1 (informal, expedited review process)	EPA, NV	10/1/15	Definite	
	Review, discuss and approve Phase 1a FSAP	EPA, NV	11/1/15	Definite	
	Perform and complete phase 1 of sampling	AR	12/1/15	Definite	
	Submit Phase 1a DSR	AR	3/1/16	Conditional	
	Review and provide comments on Phase 1a DSR	EPA, NV	4/1/16	Conditional	
	Submit Final Phase 1a DSR (if needed)	AR	4/10/16	Conditional	
	Meet and Discuss Phase 1b FSAP	All	4/11/16	Conditional	
	Submit Phase 1b FSAP	AR	6/1/16	Conditional	
	Review and provide comments on Phase 1b FSAP	EPA, NV	7/1/16	Conditional	
	Submit Final Phase 1b FSAP (if needed)	AR		Conditional	
	Implement Phase 1b FSAP	AR		Conditional	
	Complete Phase 1b FSAP	AR		Conditional	
	Submit Phase 1b DSR	AR		Conditional	
	Review and provide comments on Phase 1b DSR	EPA, NV		Conditional	
	Submit Final Phase 1b DSR (if needed)	AR		Conditional	
	Meet and Discuss Phase 2 FSAP	All		Conditional	
	Submit Phase 2 FSAP	AR		Conditional	
	Review and provide comments on Phase 2 FSAP	EPA, NV		Conditional	
	Submit Final Phase 2 FSAP (if needed)	AR		Conditional	
	Implement Phase 2 FSAP	AR		Conditional	
	Complete Phase 2 FSAP	AR		Conditional	
	Submit Phase 2 DSR	AR		Conditional	
	Review and provide comments on Phase 2 DSR	EPA, NV		Conditional	
	Submit Final Phase 2 DSR (if needed)	AR		Conditional	
	Submit RI DSR #2 –Data validation	AR	1/1/16	Definite	
	Review and discuss RI DSR #2 (informal, expedited review process)	EPA, NV	2/1/16	Definite	
	+ Perform phase 2 sampling	AR	6/1/16		
	Submit HHRA TM #2 – Data Evaluation (why is TM#2 date so far out? I still think it can and should follow closely the Phase 1 sampling; we could always add another TM for Phase 2 sampling if deemed necessary. Seriously, what do we really need to know that can affect human health that can't be defined in one phase of sampling?)	AR	6/1/16 1/1/16		

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	Review and discuss HHRA TM #2 (informal, expedited review process)	EPA, NV	2/1/16		
	Submit HHRA TM #3 – Exposure Assessment	AR	3/1/16		
	Review and discuss HHRA TM #3 (informal, expedited review process)	EPA, NV	4/1/16		
	Submit HHRA WP	AR	5/1/16	Conditional	
	Review and provide comments on HHRA WP	EPA, NV	7/1/16	Conditional	
	+ Submit Draft HHRA/RI Report to EPA & NDEP	AR	10/1/16	Conditional	
	Review and provide comments on Draft HHRA/RI Report	All	11/1/16	Conditional	
	Submit Final HHRA/RI Report to EPA & NDEP	AR	12/1/16	Conditional	
OU-7: FS	Initiate Conceptual Feasibility Study (FS) discussions	EPA, NV	7/1/15	Definite	
	Initiate development of Draft FS	AR	3/1/16	Conditional	
	Submit Draft FS Report	AR	5/1/17 7/1/16	Conditional	
	Review and provide comments on Draft FS Report	EPA	7/1/17 9/1/16	Conditional	
	Submit Final FS Report	AR	8/1/17 10/1/16	Conditional	
	Review and provide comments on Final FS Report	EPA, NV	10/1/17 12/1/16	Conditional	
OU-8:	Finalize OU-8 CCP & Interim Stormwater Mgmt Plan and	NV	3/26/15	Complete	3/26/15
	Submit revised O&M Plan to EPA (not sure if this is done yet, or if not when it will be)	AR	4/1/15	Definite	
	Determine Phase I Pond capacity and likely useful life remaining & submit plan for maximizing its use.	AR	4/2/15	Complete	4/2/15
	Site visit to view FMS leaks at Mega Sump and Pond B	NV, EPA	4/2/15	Complete	4/2/15
	Submit Final Draft CCP to EPA and AR for review and comments	NV	5/15/15	Definite	
	Review and make decisions on Phase I pond next steps. This is becoming more critical now, as of 4/21/15.	NV, EPA, AR	6/1/15	Definite	
	Discuss site-wide milestones and target dates	EPA, NV	4/27/15	Complete	4/27/15
	Discuss general tribal/agency interactions, including comments protocols and schedules	EPA/ YPT	4/29/15	Definite	
	Discuss site-wide strategy, timelines, action items and target dates, and schedules	NV, EPA, AR	5/1/15	Definite	
	Discuss site-wide stormwater management planning. This should include Tribe also.	All	5/15/15	Conditional	
	Discuss site-wide borrow material planning. Maybe get feedback from Tribe also.	All	5/15/15	Conditional	
	+ Discuss bottled water program changes for community and tribal roll-out/meetings	EPA, AR	8/5/15	Conditional	

Key: Shaded elements indicate opportunity for some concurrent activities, rather than strict step-wise milestones/activities.

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* Indicates an informal, efficient (30-day) review process (via phone call or email; not formal written comments required by stakeholders or YPT) for key deliverables that are part of a larger document submittal (that does have a formal, 60-day, review and written comment process). YPT and Tribal consultant have generally agreed to this but EPA may need written confirmation of this verbal agreement.

** Indicate milestones and deliverables that may be completed sooner, based on future discussions with EPA, NDEP and ARC.

*** Indicates the potential for OU-4a characterization phases to be merged, and specific WP elements to be combined, changed or deleted.

+ Specific entry comments, noted below:

OU-1: Transport Model: Stakeholders determined not necessary to have AR develop a Transport Model at this time; Flow Model will suffice for now; if it is later determined that the flow model is not adequate for evaluating potential GW response actions, the transport model may be required.

OU-1: Bedrock Characterization WP: 5/7/15 meeting –stakeholders decided to not have AR produce a Bedrock WP at this time –not deemed necessary, DSR will suffice –due 12/31/15.

OU-3: OU-3 HHRA process will progress faster than OU-1, and RI process is initiated now.

OU-4: Perform Phase 2 sampling if needed, and as necessary date should be moved forward by at least 3 months (AR)

OU-7: RI Report could be pushed a year depending on sampling work, CSM and monitoring requirements.

OU-8: AR not ready to have this discussion yet, unknown how wells not in program/system will be treated.

All = EPA, NDEP, AR, YPT and/or SPS